

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

INNOVATION VENTURES, LLC;
LIVING ESSENTIALS, LLC and INTERNATIONAL
IP HOLDINGS, LLC,

Case No. 12 Civ.5354 (KAM)

Plaintiffs,

**NOTICE OF MOTION TO
ADMIT COUNSEL PRO HAC
VICE**

- against -

ULTIMATE ONE DISTRIBUTING CORP., ET AL.

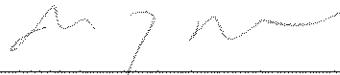
Defendants.

To: PATTERSON BELKNAP WEBB & TYLER LLP
Geoffrey Potter
Christos G. Yatrakis
Thomas P. Kurland
Michelle Cohen
Jonah M. Nobler
Alexander Michaels
Jeremy A. Weinberg
Jane Metcalf
Attorneys for Plaintiff
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PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the certificates of good standing annexed thereto, we will move this Court pursuant to Rule 1.3(c) of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, partner with the firm of Plunkett Cooney and a member in good standing of the Bar of the State of Michigan, and I am also admitted to practice and in good standing in the United States District Court for the Eastern District of Michigan, the United States District Court for the Western District of Michigan, and the United States District Court for the Northern District of Indiana, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Defendants Universal Wholesale, Inc. and Joseph Sevany, Sr., a.k.a. Joe Zaitouna. There are no pending disciplinary proceedings against me in any state or federal court.

Respectfully Submitted,

PLUNKETT COONEY



By: Michael J. Barton (P34509)
Attorney for Defendants
Universal Wholesale, Inc. and
Joseph Sevany, Sr., a.k.a. Joe Zaitouna
38505 Woodward Avenue, Ste. 2000
Bloomfield Hills, MI 48304
Telephone: 248-901-4000
Facsimile: 248-901-4040
mbarton@plunkettcooney.com

Dated: December 6, 2012

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

INNOVATION VENTURES, LLC;
LIVING ESSENTIALS, LLC and INTERNATIONAL
IP HOLDINGS, LLC,

Case No. 12 Civ.5354 (KAM)

Plaintiffs,

**AFFIDAVIT IN SUPPORT OF
MOTION TO ADMIT
COUNSEL PRO HAC VICE**

- against -

ULTIMATE ONE DISTRIBUTING CORP., ET AL.

Defendants.

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

MICHAEL J. BARTON, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Plunkett Cooney.
2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above captioned matter.
3. As shown in the Certificates of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Michigan, and I am also admitted to practice and in good standing in the United States District Court for the Eastern District of Michigan, the United States District Court for the Western District of Michigan, and the United States District Court for the Northern District of Indiana.

4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this one case for Defendants Universal Wholesale, Inc. and Joseph Sevany, Sr., a.k.a. Joe Zaitouna.

Respectfully Submitted,

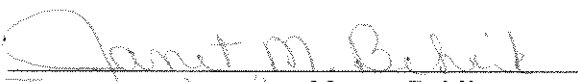
PLUNKETT COONEY



By: Michael J. Barton (P34509)
Attorney for Defendants
Universal Wholesale, Inc. and
Joseph Sevany, Sr., a.k.a. Joe Zaitouna
38505 Woodward Avenue, Ste. 2000
Bloomfield Hills, MI 48304
Telephone: 248-901-4000
Facsimile: 248-901-4040
mmcknight@plunkettcooney.com

Dated: December 6, 2012

Subscribed and sworn to before
me this 6th day of December, 2012



Janet M. Behr, Notary Public

Wayne County, Michigan, Acting Oakland.
My Commission Expires: 6-14-14

JANET M. BEHR
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES JUN 14, 2014
ACTING IN COUNTY OF OAKLAND.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

INNOVATION VENTURES, LLC;
LIVING ESSENTIALS, LLC and INTERNATIONAL
IP HOLDINGS, LLC,

Case No. 12 Civ.5354 (KAM)

Plaintiffs,

**ADMISSION TO PRACTICE
PRO HAC VICE**

- against -

ULTIMATE ONE DISTRIBUTING CORP., ET AL.

Defendants.

The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney, Michael J. Barton, is permitted to argue or try this particular case in whole or in part as counsel or advocate for Defendants Universal Wholesale, Inc. and Joseph Sevany, Sr., a.k.a. Joe Zaitouna.

This Order becomes effective upon the Court's receipt of the required \$25.00 fee and confirms your appearance as counsel in this case. A notation of your admission pro hac vice in the above listed case will be made on the roll of attorneys.

Dated: _____

UNITED STATES DISTRICT JUDGE

cc: Pro Hac Vice Attorney
Court File

State Bar of Michigan

Certificate of Good Standing

This certifies that Michael J. Barton, P34509 of Bloomfield Hills, Michigan is an active member of the State Bar of Michigan in good standing.



He/She was admitted to practice in Michigan on November 23, 1982 in Macomb County and became a member of the State Bar of Michigan on November 23, 1982.

A handwritten signature in cursive script, appearing to read "Janet K. Welch".

Janet K. Welch, Executive Director
November 14, 2012

United States District Court
Eastern District of Michigan

CERTIFICATE OF GOOD STANDING

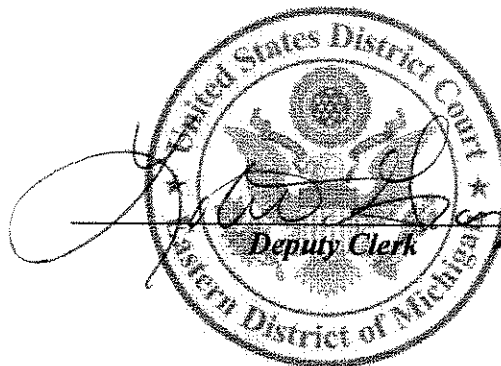
I, David J. Weaver, Clerk of Court, certify that

MICHAEL J. BARTON

*was duly admitted to practice in this Court on 12/07/1982,
and is in good standing as a member of the Bar of this Court.*

Dated at Detroit, Michigan on 11/14/2012.

David J. Weaver
Clerk



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
OFFICE OF THE CLERK**

www.miwd.uscourts.gov

399 Federal Bldg. 110 Michigan St., NW Grand Rapids, MI 49503 (616) 456-2381	B-35 Federal Bldg. 410 W. Michigan Ave. Kalamazoo, MI 49007 (269) 337-5706	113 Federal Bldg. 315 W. Allegan St. Lansing, MI 48933 (517) 377-1559	229 Federal Bldg. 202 W. Washington St. Marquette, MI 49855 (906) 226-2021
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CERTIFICATE OF GOOD STANDING

I, Tracey Cordes, Clerk of the United States District Court
for the Western District of Michigan, do hereby certify that

MICHAEL J. BARTON

was duly admitted to practice in said Court on May 27, 1997
and is in good standing as a member of the bar of said Court.

Tracey Cordes, Clerk

Dated at Grand Rapids,
Michigan, on November 15, 2012

By: 

Deputy Clerk

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

INDIANA

CERTIFICATE OF
GOOD STANDING

I, Robert N. Trgovich, Clerk of this Court,

certify that Michael J. Barton, Bar # P34509,

was duly admitted to practice in this Court on

April 30, 2012, and is in good standing
DATE

as a member of the Bar of this Court.

Dated at Fort Wayne, Indiana on December 3, 2012.
LOCATION DATE


CLERK


DEPUTY CLERK